



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

December 13, 2022

BY ECF

The Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

The Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

**Re: *United States v. Christopher Hamilton, et al.*, 18 Cr. 793 (VSB)
United States v. Mark Scott, et al., 17 Cr. 630 (ER)**

Dear Judge Broderick and Judge Ramos:

The Government respectfully submits this letter to inform Your Honors of the relationship between the recently unsealed indictment in *United States v. Christopher Hamilton, et al.*, S1 18 Cr. 793 (which was assigned to Judge Broderick), and several other indictments previously assigned to Judge Ramos.

On September 5, 2018, an indictment was unsealed in *United States v. Mark Scott, et al.*, 17 Cr. 630 (the “Scott Case”), and the case was assigned to Judge Ramos. On September 18, 2017, the case of *United States v. Gilbert Armenta*, 17 Cr. 556 (the “Armenta Case”) was assigned to Judge Pauley. In November 2019, Judge Ramos held an 11-day jury trial of defendant Mark Scott in the Scott Case. On January 10, 2020, the Government submitted a sealed related case letter in connection with the Scott Case and the Armenta Case, and, on January 17, 2020, the Armenta Case was reassigned from Judge Pauley to Judge Ramos.

On December 5, 2022, an indictment was unsealed in *United States v. Christopher Hamilton, et al.*, 18 Cr. 793 (the “Hamilton Case”), and the next day, the Hamilton Case was assigned to Judge Broderick. No defendants have yet been presented in the Hamilton Case.¹

¹ Extradition requests for the two defendants in the Hamilton Case were submitted to the United Kingdom. No final extradition determination has yet been reached for Christopher Hamilton, and the extradition request for Robert MacDonald has been denied.

There is substantial factual overlap between the Scott Case, the Armenta Case, and the Hamilton Case. All three cases relate to a multi-level-marketing fraud scheme involving a purported cryptocurrency called OneCoin (the “OneCoin Scheme”). OneCoin Ltd.² was based in Sofia, Bulgaria, and was founded in 2014 by Ruja Ignatova and Sebastian Greenwood, who are both charged in the Scott Case. OneCoin Ltd. has claimed to have over three million members worldwide. OneCoin Ltd. records show that, between the fourth quarter of 2014 and the fourth quarter of 2016, OneCoin Ltd. generated €4.037 billion in sales revenue and earned “profits” of €2.735 billion.

The Government has charged several individuals who allegedly participated in the OneCoin Scheme and/or laundered OneCoin Scheme proceeds. Gilbert Armenta, the sole defendant in the Armenta Case, pleaded guilty pursuant to a cooperation agreement³ to, *inter alia*, OneCoin-related wire fraud and money laundering conspiracy charges. In the Scott Case, (1) Scott was convicted following trial of OneCoin-related bank fraud and money laundering charges; (2) Konstantin Ignatov pleaded guilty to, *inter alia*, OneCoin-related fraud and money laundering charges; (3) David Pike pleaded guilty to a OneCoin-related bank fraud conspiracy charge; and (4) Ruja Ignatova, Sebastian Greenwood, and Frank Schneider are all currently charged with OneCoin-related fraud and money laundering charges.

In the Hamilton Case, the two defendants are charged in a two-count indictment, S1 18 Cr. 793, with OneCoin-related money laundering and wire fraud conspiracy charges. Any trial in the Hamilton Case would necessarily involve substantial evidence of the OneCoin Scheme and substantial overlap with the defendants and evidence in the Scott Case and the Armenta Case.

Last week, the Government spoke with chambers for Judge Broderick, which suggested that the Government file this letter so that Your Honors could determine if judicial efficiency would be served by having all three cases before the same Judge.

² OneCoin has operated using several corporate entities and d.b.a. names, to include “OneCoin Ltd.,” “OnePayments Ltd.,” “OneNetwork Services Ltd.,” “OneAcademy,” and “OneLife.” In this letter, these entities and d/b/a names are referred to collectively as “OneCoin Ltd.”

³ The Government has notified Armenta’s counsel that it does not intend to file a Section 5K1.1 letter on Armenta’s behalf, in view of his breach of the cooperation agreement.

Please do not hesitate to contact us if there is any other information that Your Honors require.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: /s/
Kevin Mead / Christopher J. DiMase / Nicholas Folly
/ Juliana N. Murray
Assistant United States Attorneys
Tel: (212) 637-2211 / 2433 / 1060 / 2314

cc: All Counsel of Record (via ECF)